



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

SHE-12

OCT 2 1985

Sam McWilliams
Site Manager
Ethyl Petroleum Additives Division
Sauget, Illinois 62201

Dear Mr. McWilliams:

This letter is intended to address certain issues that required further review following the August 22, 1985 discussion between David C. Bach, Donald E. Park, Harold F. Mason and yourself of Ethyl and Thomas W. Daggett and Nicholas J. Longo of the U.S. Environmental Protection Agency (U.S. EPA). This meeting was held following the completion of vertical and horizontal soil analysis for 2,3,7,8-TCDD at the Sauget, Illinois facility.

Ethyl agreed to submit a proposal to U.S. EPA for groundwater monitoring around the two areas identified as having significant 2,3,7,8-TCDD concentrations at depth. This proposal should be submitted by October 20, 1985. After a two week review by U.S. EPA, Ethyl should plan to mobilize the drilling project within one month if U.S. EPA comments are acceptable to Ethyl. During the drilling, deeper soil samples at location "I" should be performed. Sampling of the monitoring wells should take place no earlier than one week after the wells have been properly developed. Parameters to be analyzed should include 2,3,7,8-TCDD, tetra-octa dioxins and furans. A priority pollutant analysis is also to be done at selected monitoring well locations.

Ethyl proposed not to include in any construction restraint area that area contaminated at the 1-5 ppb 2,3,7,8-TCDD based on a July 9, 1984 Center for Disease Control document that indicated a reasonable level for a clean-up standard would be 5 ppb. It is our understanding that this assessment was intended to address general industrial activity, not construction activities that would be expected to disturb the soil. Despite the fact that this is an industrial facility, U.S. EPA is concerned with short term exposure to construction workers to soils over 1 ppb. U.S. EPA is therefore designating the following area as significantly contaminated:

From a point 285E, 700N north to point 285E, 1100N; east to point 330E, 1100N; south to point 330E, 1000N; east to point 585E, 1000N; south to point 585E, 820N; west to point 435E, 820N; south to point 430E, 700N; and west to point 285E, 700N.

135E


The area bounded by 1400N, 1600N, 50E and 250E should be considered as contaminated. The soil from this area is not to leave the facility but other construction restraints are relieved.

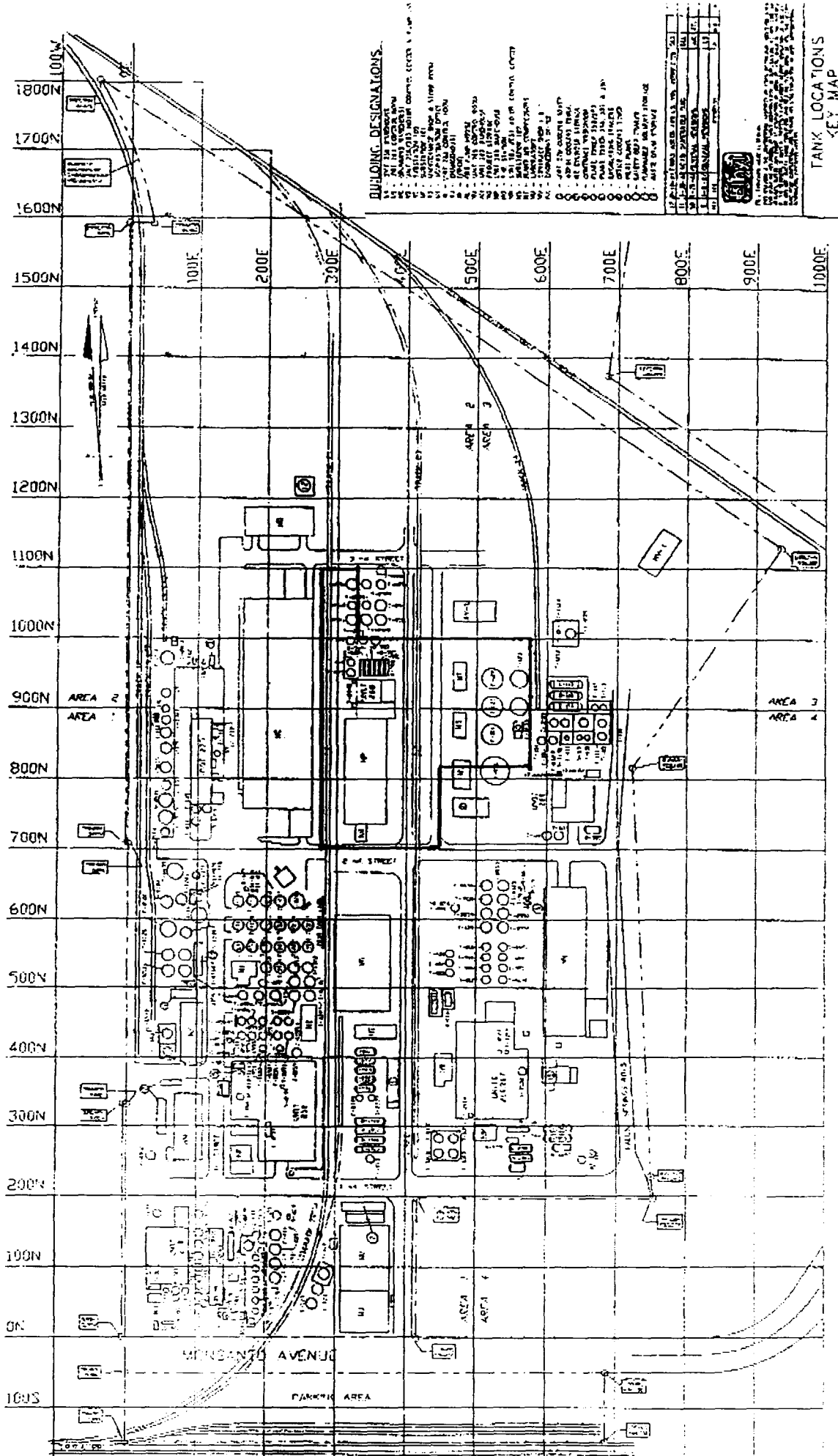
In addition, Track 23 north of the significantly contaminated area to the northern boundary should be considered significantly contaminated within 10 feet of either side of the track. 2,3,7,8-TCDD samples should be taken along the track at the intersection with 1200N and 1400N. Two samples should also be taken off-site; one before the juncture with Track 24 and one after the juncture with Track 21.

With this letter, construction restraints on the facility are removed outside the significantly contaminated boundaries indicated except for a requirement that any soil excavated from areas where any level of 2,3,7,8-TCDD has been detected must be maintained on-site. This includes the NC expansion project. *

If you have any questions concerning this facility, please contact Nicholas J. Longo of the Hazardous Waste Enforcement Branch at (312) 886-4746 or Thomas W. Daggett, Assistant Regional Counsel at (312) 886-4245.

Sincerely,


Norman Niedergang, Chief
CERCLA Enforcement Section



REFERENCE DRAWINGS

BUILDING DESIGNATIONS

TANK LOCATIONS
KEY MAP

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